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September 27, 2019

By ECF

Honorable Judge Sanket J. Bulsara
United District Court Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Government Employees Ins. Co., et al. v. Epione Medial, P.C. et al.*
Docket No. 18-cv-03159(SJ(SJB))

Dear Magistrate-Judge Bulsara:

This firm represents Plaintiffs (collectively, "GEICO") in the above referenced matter. I submit this letter on behalf of GEICO pursuant to the Court's Minute Order of August 1, 2019 requesting a status as it relates to whether the parties wish to participate in a settlement conference and, if so, in what timeframe.

GEICO and Defendants have had settlement discussions throughout this case. GEICO's discussions with Defendants' prior counsel seemed promising to GEICO, but the current settlement position expressed by Defendants' new counsel indicates that the parties are further apart than GEICO believed based on its discussions with prior counsel. GEICO continues to believe that Your Honor's settlement conferences are productive (with three of the past four GEICO cases pending before Your Honor settling either at the conference, or shortly before or after the conference). Nevertheless, with respect to this matter, it does not seem that a settlement conference is likely to be an efficient use of the Court's or the parties' time and resources at this time.

GEICO remains willing to continue discussions with Defendants' new counsel throughout the remainder of the fact discovery period. GEICO suggests that a settlement conference may have a better chance of success if conducted at the close of fact discovery, sometime on or after December 13, 2019.

Thank you for your attention to this matter.

Respectfully submitted,

RIVKIN RADLER LLP

/s/

Priscilla D. Kam

cc: All counsel via ECF

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